

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
EASTERN DIVISION

UNITED STATES OF AMERICA)
)
)
v.) 3:06-cr-141-MEF
)
)
)
CLAUDE JEROME WILSON II)

DEFENDANT'S REQUESTED JURY VOIR DIRE

COMES NOW, the Defendant, Claude Jerome Wilson II, by and through undersigned counsel, J. Carlton Taylor, and respectfully requests that the following Jury Voir Dire be asked of the jury in the above styled case.

RESPECTFULLY SUBMITTED, this the 4th day of August, 2008.

/s/ J. Carlton Taylor
J. CARLTON TAYLOR (TAY058)
ASB-5037-L53J
Attorney for the Defendant

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REQUESTED VOIR DIRE

1. Please introduce yourself to us: state your name, marital status, and your children, if any, and your educational background, employment, the employment of your children, any experience you or your spouse have had in the military (including rank, branch of service, and specialty), your home, and the city and neighborhood in which you live.

2. During trial everyone will need to hear the witnesses, the attorneys and the Court. With that in mind, if can hear me, please raise your hand.

3. Do any of the jurors here today have health conditions which may interfere with their ability to serve as a juror or which you feel the court needs to be aware

of. If you do, you may step forward in order to have a brief discussion of this matter with the court in private.

4. Are any of you taking medicine which may affect your ability to concentrate or sit through the trial?

5. Has anyone heard news stories or read any articles regarding this case or any related cases involving Mr. Wilson or his sister, Lisa Graham? If you have heard news stories or articles regarding this case, have any of you discussed this case with others and/or formed opinions on the guilt or innocence of any the Defendant? If so, what opinions have you formed?

6. Mr. Wilson sits before you presumed innocent of any offense and if the trial ended this moment, it would be your duty to find him not guilty as there is absolutely no evidence against him. The government must prove his guilt of any offense beyond a reasonable doubt. Does anyone believe that the burden placed upon the prosecution is unfair or the government should not be required to prove its case beyond a reasonable doubt?

7. Does anyone here believe that simply because the Defendant has been indicted by a Grand Jury that the Defendant must be guilty, because he has been indicted?

8. To the best of your knowledge, have you or any member of your immediate family ever been counseled or represented by the United States Attorney or any of her staff. If yes, raise your hand and state who you know in this capacity.

9. Are any other members of this jury panel, a relative, a friend, or co-worker or associate of yours? If yes, raise your hand and state who you know in that capacity.

10. Please raise your hand if you have ever participated in a court case, either as a plaintiff, a defendant, a witness, or in any other role? Please describe the court case and your involvement in it. How do you feel about your dealings with the court system in that matter? How does that experience affect how you feel about your role in this court today?

11. Please raise your hand if you have ever testified before a Grand Jury? Please generally describe the matter and state on whose behalf you were testifying.

12. Have any of you ever been the victim of a crime? What type of crime? When did it occur? Was there a prosecution in court? How do you feel about your dealings with the criminal justice system in that matter? How does

the experience of that crime or the related experience with the criminal justice system affect how you feel about your role as a juror here?

13. Are you now, or have you ever served as any type of law enforcement officer, fulltime or part-time, paid, military or volunteer? If yes, raise your hand and describe your involvement with law enforcement. Include any volunteer work you did for a city or county government or school or college.

14. Have any of you or any member of your family or any of your friends ever had any contact with any employee of the Sheriff's Department of Lee County, the Bureau of Alcohol, Tobacco and Firearms (ATF) or any Federal Investigative Agency? Please tell us about that contact. If you would prefer, you may discuss the matter in private at the bench.

15. You will hear testimony from law enforcement officers and agents. Would you tend to believe the testimony of such a government agent or employee just because he or she is a government employee or agent?

16. This case involves charges that the Defendant was unlawfully in possession of a firearm. In this case, the

Government will attempt to show that Mr. Wilson was in possession of a pistol. Are any of you members of any association, any social or hunting club, organization, or group that espouses gun ownership, hunting or competitive shooting? For instance, the National Rifle Association?

17. Is there anyone hear that belongs to any association, organization or group whose main purpose is to limit gun ownership?

18. Do you know of any reason, matter or thing that may prevent you from doing your sworn duty to render an impartial verdict based solely upon the evidence presented in this trial and the law as you receive it in the Court's instruction?

RESPECTFULLY SUBMITTED, this the 4th day of August, 2008.

s//J. Carlton Taylor
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CERTIFICATE OF SERVICE

I hereby certify that on this the 4th day of August, 2008, I electronically filed the foregoing Defendant's Requested Jury Voir Dire with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

Christopher A. Snyder, AUSA
Verne Spears, AUSA
Office of the U.S. Attorney
Middle District of Alabama
PO Box 197
Montgomery AL 36101-0197

s//J. Carlton Taylor
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